

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NEW YORK

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In re

Case No. 811-73479-736
Chapter 7

DANIEL B KARRON, AKA DIANNE KARRON,
AKA D B KARRON, AKA DAN KARRON,

Debtor.

APPLICATION

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TO HON. ROBERT E. GROSSMAN, U.S. BANKRUPTCY JUDGE:

Neil H. Ackerman, Esq. (“Applicant”) respectfully shows this Honorable Court and represents:

1. This case was commenced by a voluntary Chapter 7 Petition filed by the debtor with this Court on May 16, 2011.
2. Applicant is the appointed and acting Trustee in this case.
3. Applicant has determined that it is necessary to employ counsel to assist him in the orderly administration of this estate and the fulfillment of his duties. Among other things, Applicant requires counsel in order to prepare the necessary motions, applications, orders and other legal documents that may be required under the Bankruptcy Code and to perform all other legal services for the Trustee which may be necessary in connection with the Trustee's attempts to recover and properly administer the assets of the estate.
4. Applicant wishes to retain Ackerman Spence, PLLC as general counsel in this case under a general retainer due to the extent of legal services which may be required during the pendency of this case.
5. Ackerman & Spence’s present fee schedule, subject to adjustment in the future, is (a) \$350-\$475 per hour (depending on experience) for all work done by members, (b) \$250-\$385 per hour for all work done by “of counsel” and associate attorneys, and (d) \$100-\$175 per hour

(depending on experience) for all work done by paralegals and legal assistants.

6. To the best of Applicant's knowledge, information and belief, (a) neither Ackerman Spence, PLLC nor any of its members or employees hold or represents any interest adverse to creditors or to the Estate herein with respect to the matters upon which it is to be engaged, and (b) Ackerman Spence, PLLC and its members and employees are disinterested persons as that term is defined at 11 U.S.C. §101. (The aforementioned representations are verified in Applicant's attached affidavit as a member of Ackerman Spence, PLLC).

7. Applicant has not previously applied to this or any other Court for the relief sought in this application.

WHEREFORE, Applicant respectfully requests that this Court immediately issue the attached proposed Order under 11 U.S.C. §327(a), together with such other, further relief to Applicant, as trustee, and the bankruptcy Estate in this case as this Court deems to be proper and just.

Dated: Jericho, New York
August 15, 2011

NEIL H. ACKERMAN, ESQ., TRUSTEE

/s/ *Neil H. Ackerman*
c/o Ackerman Spence, PLLC
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